

2 TO GT

## ORIGINAL

(59)  
11-13-02  
SCIN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JEFFREY D. ALBRIGHT, NORMAN T.	)
BOIRE, GARY M. DIETZ, WILLIAM H.	)
ERDMAN, MICHAEL W. FRITZ,	)
A. RONALD FROMBAUGH, RALPH A.	)
HARRIS, ALLEN W. LANDIS, LOWELL	)
MCGUIRE, WALTER R. MINICH,	)
RAYMOND C. NEVINS, STANLEY L. NYE,	)
VINCENT RAMIREZ, JR., KEITH E.	)
SCRIGNOLI, RAY G. SNYDER, JR., and	)
LAWRENCE D. WELKER,	)
Plaintiffs	)
v.	)
DANIEL A. VIRTUE, Business Agent of the	)
International Brotherhood of Teamsters;	)
INTERNATIONAL BROTHERHOOD OF	)
TEAMSTERS; LOCAL 776, INTERNATIONAL	)
BROTHERHOOD OF TEAMSTERS; ABF	)
FREIGHT SYSTEM, INCORPORATED,	)
Defendants	)
	)

FILED  
HARRISBURG, PA

NOV 12 2002

MARY E. D'ANDREA, CLERK  
Put \_\_\_\_\_  
Deputy ClerkCase No. 1:CV-00-878  
Judge Sylvia H. Rambo**PLAINTIFFS' MOTION FOR RECONSIDERATION OF MOTION  
FOR EXTENSION OF TIME FOR DISCOVERY**

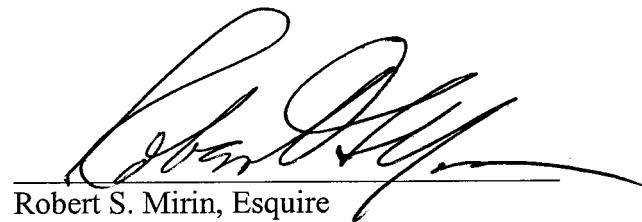
AND NOW COMES Plaintiffs' by and through their counsel, Robert S. Mirin, Esquire of Ahmad & Mirin in response to the *Order* filed on November 7, 2002, and avers the following:

1. Plaintiffs' counsel requests reconsideration of item #2 in the Court's Order filed on November 7, 2002.
2. It was not until the telephone deposition of Gordon Ringberg, which was set up at the convenience of the company, that Plaintiffs' counsel became aware that Ms. Connie Chambers involvement in a form proffered by Defendant Company in discovery appeared to be at variance with other evidence (Ringberg's deposition). It was that Mr. Ringberg's responses concerning a document preporing to reflect company seniority records in deposition strongly suggested that Ms. Chambers duties were far more than

ministerial as previously had been indicated to Plaintiffs' counsel. As the deposition proceeded, it became increasingly more apparent that Ms. Chambers duties were for more than ministerial in reference to a document in which she ostensibly helped produce and maintain.

**WHEREFORE**, Plaintiffs' counsel respectfully requests that the Court reconsider its Order.

Respectfully submitted:



\_\_\_\_\_  
Robert S. Mirin, Esquire  
ID# 25305  
AHMAD & MIRIN  
8150 Derry Street, Suite A  
Harrisburg, PA 17111  
(717) 909-4343  
Attorney for Plaintiffs

**CERTIFICATE OF SERVICE**

I, Sherry A. Clark, hereby certify that on this 12 day of November, 2002, a copy of *Plaintiffs' Motion for Reconsideration of Motion for Extension of Time for Discovery* was served via first-class mail, postage prepaid, on the following:

**VIA FACSIMILE AND FIRST-CLASS MAIL**

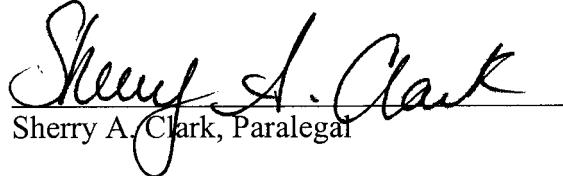
Joseph E. Santucci, Jr., Esq.  
Robyn Weiss (202) 739-3001  
MORGAN, LEWIS & BOCKIUS, L.L.P.  
1111 Pennsylvania Avenue, N.W.  
Washington, DC 20004

Ira Weinstock, Esq.  
Jason Weinstock, Esq. (717) 238-6691  
IRA WEINSTOCK, P.C.  
800 N. 2<sup>nd</sup> Street  
Harrisburg, PA 17102

**VIA FIRST-CLASS MAIL**

Vincent Candiello, Esq.  
MORGAN, LEWIS & BOCKIUS, L.L.P.  
One Commerce Square  
417 Walnut Street  
Harrisburg, PA 17101

James A. McCall, Esq.  
Special Counsel  
INTERNATIONAL BROTHERHOOD OF TEAMSTERS  
25 Louisiana Avenue, N.W.  
Washington, DC 20001

  
Sherry A. Clark, Paralegal